

From: Merle C. Bone – W0EWM  
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Subject: RM – 11306 as Amended By The ARRL

### Section 97.221

I am writing to oppose the expansion of sub-band allocation for current “automatic mode HF stations” as currently defined in 97.221. I also oppose any inclusion of new sub-bands for the ARRL proposed “semi-automatic” operation. Amateur radio communications have always been designed for “interactive” communications. The further widening of sub-bands used by “automatic or semi-automatic” stations is not warranted and can quickly use up the small amount of bandwidth that is available for amateur radio use. There is an unending quantity of non interactive digital data, as the Internet has proven. Subjecting the amateur radio bands to that data source would spell the end to amateur radio as it currently exists.

### Section 97.119

I am writing to ask that the FCC carefully consider alternatives to the proposal by the ARRL in 97.119 (3) Used emission mode. I am very concerned that new data modes will use coding and exotic/expensive modulation techniques that most radio amateurs may not have the hardware or software to decode. Therefore, in order to maintain band discipline, it is important that radio amateurs be able to identify stations that are violating amateur rules with their emissions. There needs to be a “lowest common denominator” mode that stations have to use for “periodic identification” so that others can determine who they are. I don’t know how to “pick that identification mode” but I ask for the FCC’s help in finding a way that most amateurs can identify stations running new digital emission modes and coding techniques. Certainly today’s technology should allow the use of

“multi-mode” transmissions where appropriate for identification purposes.

#### Section 97.307

I am writing to ask that the FCC reduce the bandwidth proposed for RTTY by the ARRL in their proposal for section 97.307 (f) (3) The bandwidth of a RTTY or data emission must not exceed 3 kHz. I don't believe there is currently any amateur or commercial RTTY mode that exceeds a 1KHz bandwidth. There fore I urge the FCC to limit this bandwidth to 1KHz, which will accommodate many more users within the same sub-band bandwidth.

#### Section 97.309 (a)

I am writing to oppose the ARRL proposal to allow:

“a) Where authorized by §97.305(e) and (f), an amateur station may transmit a RTTY or data emission using published digital codes for the purpose of facilitating communications.”

The amateur radio bands were designed for open communications and experimentation. There should not be any “presumption of privacy” associated with communicating on the amateur bands. Amateurs have the ability to use coding in extreme emergency situations to support emergency communications and that is all of the coding that should be allowed.

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Thank you for your consideration of my comments on the current RM-11306.

Sincerely,

Merle C. Bone – W0EWM